

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

Master File No. 2:22-cv-01282-JLR

JLR

*In Re: Zillow Group, Inc. Session  
Replay Software Litigation*

**JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING  
INITIAL DISCLOSURES**

The Document Refers to: All Actions

NOTE ON MOTION CALENDAR:  
March 23, 2023

Plaintiffs Natalie Perkins, Kenneth Hasson, Jamie Huber, David Kauffman, Mark Conlisk, Michael Dekhtyar, Ashley Popa, Jill Strelzin, Jill Adams, Jill Adams, as natural mother and next friend of her minor child, H.A, and Ryan Margulis (collectively “Plaintiffs”) and Defendants Zillow Group, Inc. (“Zillow”) and Microsoft Corporation (“Microsoft”) (collectively with Zillow, “Defendants”), by and through their undersigned counsel, hereby stipulate that the time to exchange Initial Disclosures shall be extended through and including April 24, 2023, and in support thereof allege as follows:

1. On February 24, 2023, this Court entered an Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement. (Doc. No. 39). Pursuant to this Order, the parties are required to exchange Initial Disclosures on March 24, 2023.

2. Pursuant to this Court's January 18, 2023 Order (Doc. No. 33), Plaintiffs shall file a consolidated amended complaint or designate an operative complaint no later than April 10, 2023.

3. The parties held a Rule 26(f) conference on March 8, 2023. They continue to meet and confer regarding the contents of a Combined Joint Status Report and Discovery Plan, which will be filed with the Court on March 31, 2023.

4. The parties agree to exchange Initial Disclosures on April 24, 2023 so that those disclosures may address any issues raised by the anticipated consolidated amended complaint. The parties had originally contemplated that Rule 26(f) related deadlines would be extended until after Plaintiffs filed a consolidated amended complaint. (*See* Doc. No. 33 at ¶10 (k)).


5. The extension is not for the purpose of delay and will not cause prejudice to the respective parties.

6. Therefore, the parties, through counsel of record, hereby move for and stipulate to the following proposed order:

**[PROPOSED] ORDER**

a. It is hereby ordered that the time for the parties to exchange Initial Disclosures is extended through and including April 24, 2023.

Dated this 23rd day of March, 2023.



The Honorable James L. Robart  
UNITED STATES DISTRICT JUDGE

IT IS SO STIPULATED.

DATED: March 23, 2023

Respectfully submitted,

/s/ Joseph P. Guglielmo

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